

Privacy Advisory Board: Smart Streetlights/ALPRs
Proposal

**First Pass Review Subcommittee
Recommendation OPTIONS
June 22, 2023**

First Pass Review Subcommittee

- Mihir Bellare
- Robert Lee Brown
- Taura Gentry-Kelso
- Pegah K Parsi (chair)



PD Proposal Timeline

- April 27th: PD presentation to full PAB; PAB invitation to meet and work collaboratively with PD on proposal
- May 10th: Through City Staff, submitted list of questions along with invitation to meet with PD.
- May 12th: Through City Staff, extended invitation to meet with PD; requested information about vendor identity and contracts, if any
- May 25th: Extended invitation to meet with PD
- May 30th: PD written response to PAB questions; ALPR vendor not identified
- June 13th: Extended invitation to meet with PD. Submitted additional/follow-up questions
- As of June 16th, no response to invitations has been received



Options

The PAB First Pass Review Subcommittee has prepared **2 different options** for the PAB's consideration and vote:

- Option #1: Recommend approval of the proposal as is
- Option #2: Recommend rejection for non-compliance with Ordinance



OPTION #1

- **Recommend that City Council approve** the Surveillance Impact Report and Use Policy submitted in April without modifications for the following reasons:
 - Questions have been answered
 - Sufficient due diligence shown
 - Implementation is sufficient to serve San Diegans



OPTION #2

Recommend that City Council reject the Surveillance Impact Report and Use Policy submitted in April for the following reasons:

- **Substantive concerns with the impact report; noncompliance with Ordinance**
 - Missing (ALPR) and insufficient (SSLs) vendor information (§210.0101(n)(1))
 - Insufficient mitigations (§210.0101(n)(5))
 - Insufficient security information (§210.0101(n)(7))
 - Insufficient third-party dependency information (§210.0101(n)(9))
 - No alternatives explored (§210.0101(n)(10))
 - Track record of technology not explained (§210.0101(n)(11))
- **Substantive concerns with the use policy; noncompliance with Ordinance**
 - Unclear purposes and goals (§210.0101(o)(1))
 - Broad uses (§210.0101(o)(2))
 - Insufficient information about data collection (§210.0101(o)(3))
 - Broad access (§210.0101(o)(4))
 - Insufficient security safeguards (§210.0101(o)(5))
 - No information regarding data sharing (§210.0101(o)(8))
 - No maintenance information (§210.0101(o)(11))



OPTION #2 (cont'd)

- **Other substantive concerns**
 - No contracts have been provided (§210.0107)
 - Incomplete location selection criteria
 - No metrics and review process provided
 - Unclear AI-based analytics information
 - Efficacy of program unclear
 - Lack of trust in SDPD
- **Process concerns**
 - Community input limited by lack of translation services
 - Lack of collaboration between SDPD and PAB
 - Ordinance timeline confusion
- Appendix I describes timeline of events; Appendix II describes PAB community engagement and comment themes

